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Fax:	(614)-466-0313	Pages:	7
Phone:	(614)-466-4095	Date:	February 28, 2018
Re:	City of Xenia, Case# 18-0302-GA-GAG Amendment to Plan of Operation and Governance "Opt-Out" Section	cc:	

☐ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Good Afternoon:

We would like to submit an amendment for City of Xenia, Case #18-0302 GA-GAG, section regarding residents, who previously opted-out of the program, in the Plan of Operation and Governance Plan.

Please see the attached update.

Thank you,

Andrea Flowers
Palmer Energy Company
Consultant for City of Xenia

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Technician Am Date Processed 2/28/18

THE CITY OF XENIA NATURAL GAS AGGREGATION PROGRAM

PLAN OF OPERATION AND GOVERNANCE

Purpose

The goal of this program is to facilitate additional choices for the supply of natural gas for eligible residential and commercial consumers, pursuant to Ohio Revised Code section 4929.

The City of Xenia Natural Gas Aggregation Program seeks to aggregate the retail natural gas loads of consumers located in the City to obtain the lowest price for the supply of natural gas. Participation in the City of Xenia aggregation program is limited to individuals who are not already under contract with an alternative CRNGS.

This program is voluntary. Every eligible customer has the opportunity to decline to be a member of the aggregation program and to remain with Vectren or to enter into a natural supply contract with any other competitive retail natural gas services provider (CRNGS).

Process

On November 8, 2005, the City of Xenia voters approved the development of a form of natural gas government aggregation, known as opt-out aggregation. The City shall follow the process of governmental aggregation as set out in Ohio Revised Code section 4929.26 and the rules set out by the Public Utilities Commission of Ohio (PUCO).

A municipal corporation may automatically aggregate its residents after passage of an opt-out ordinance, approval by a majority of the voters and adoption of a Plan of Operation. The City has accomplished all of these requirements.

The process will entail selection of a CRNGS, mailing opt-out notices to eligible customers, generating a list of participants who did not opt out, then transferring the participants to the chosen CRNGS.

City of Xenia Aggregation Program

The purpose of the aggregation program is to reduce the amount consumers pay for natural gas. The City will not buy and resell the natural gas for the participants of the program. Instead, The City of Xenia and its energy consultant will competitively bid and negotiate a contract with a CRNGS to provide natural gas to the members of the aggregation program.

The City of Xenia will obtain the list of customers within its boundaries from Vectren, either by zip code or by method provided by the utility. The City will have its CRNGS cleanse the data to ensure that it does not contain customers with alternate suppliers, PIPP customers, and any other excludable consumers, and only those who live within the

jurisdictional boundary. The City will then have its CRNGS send an opt-out notice to each eligible customer which discloses the offered price for natural gas along with any applicable contract terms. The opt-out notice will clearly inform potential customers that they may opt-out of the program during the 21-day period following the mailing of the notification, along with instructions on how to opt-out. Customers who opt-out of the City's aggregation program during this initial notification period will remain with Vectren unless and until the customer chooses an alternative CRNGS or chooses to opt-in to the aggregation program at a later date.

Operation

All necessary technical analysis, competitive procurement of services, regulatory approvals, accounting and fiscal management, contract maintenance, communications, program coordination and administrative support will be professionally provided by existing staff and an energy consultant, as well as the chosen CRNGS.

Funding

The primary expenses associated with operating this program are printing and mailing cost of the opt-out notices, and fees for an energy consultant. Instead of paying for these costs upfront, it shall be The City's goal to have the chosen CRNGS absorb these fees into their offered rates of the program participants.

Notification of Customers

All eligible customers in The City of Xenia will receive opt-out information in the mail. The City of Xenia will adhere to all eligibility requirements of R.C. 4929.26. Essentially, eligible customers cannot be under contract to buy natural gas from an alternate CRNGS or a mercantile customer.

The opt-out notice shall clearly inform customers of the offered rate, and that they have the right to opt-out of The City's aggregation program within twenty-one days after the mailing of the notice without paying a switching fee. The opt-out notice will fully describe how to opt-out. After the completion of the opt-out process, the residents who did not opt out will be included in The City's aggregation program.

Customer opt-out

Customers may opt-out of The City of Xenia aggregation program at no charge within the twenty-one day period following the mailing of the notice containing the rates and terms of the aggregation program. Customers who return the required opt-out notice will remain customers of Vectren. The City will offer the twenty-one day period during

which customers can opt-out of the aggregation program without charge at least every two years pursuant state law.

Customer opt-in

The City of Xenia intends on having its supplier allow customers who move into or within The City of Xenia to opt into The City's aggregation program by calling and voluntarily signing up with the supplier. The City will strive to provide these new customers with a rate similar to those who had been in the pool from the beginning. Additionally, the City's supplier may obtain a refreshed customer list from Vectren approximately every six months. The City's supplier may then send aggregation information to those eligible customers identified on the refresher list. Whether this information is in opt-in or opt-out format will depend on the negotiated language of the supplier contract. If interim opt outs are to take place; a twenty-one day opt-out will occur in the manner described above.

Joining the Program at a later date

Residents of the City who initially chose to opt-out of the Program, for whatever reason, and wish to enroll at a later date, will be treated the same as a new resident. That is they will not automatically become part of the existing program, but will be given an opportunity to enroll. However, the City cannot guarantee that rates, terms and conditions to consumers enrolling in the Aggregation after the initial 21 day opt-out period, will match those of the initial enrollee.

Disputes

The procedure for handling complaints will be in accordance with the rules set by the PUCO, and handled by the retail natural gas supplier. Dispute resolution provisions will also be in accordance with PUCO regulations. The opt-out package will contain the telephone numbers and websites for the PUCO and the Ohio Consumers Counsel, as well as the supplier's toll-free number.

The City of Xenia supplier will maintain this toll free number for all customer related questions and complaints. The City shall require that the personnel assigned to answer these calls be trained and provided the knowledge specific to The City's program.

Termination of natural gas supply program

The natural gas supply program may be terminated at the expiration of the supply contract without any extension, renewal or subsequent supply contract being negotiated.

In either event, the aggregation pool customers will return to Vectren unless and until they switch to an alternate supplier. Each individual customer receiving natural gas supply service under The City of Xenia aggregation program will receive notification of the termination of the program before termination.

Rates

The Department of Public Utilities shall receive proposals from CRNGS using a competitive selection process. Bidders will be requested to provide a fixed price, floating price, a percent off rate, or a combination of the above. If consumers will have the option of choosing between fixed and floating prices, the opt-out package will contain ample and easy to understand information to aid the consumer in deciding which option best suits their natural gas needs. The City will decide which pricing structure(s), to offer based on the bids received, and an analysis of the current and projected market status as well as the bids received.

Billing and Payment

The City of Xenia will continue to have Vectren bill customers monthly, using an itemized format approved by the PUCO. The City will not become involved in any payment delinquency issues and thus will not require any type of consumer credit or deposit. If The City's supplier wishes to pursue payment delinquency issues, details of the supplier's credit and deposit policies will be included in the opt-out package.

Vectren will continue to deliver the natural gas purchased on the City's aggregation program through its natural gas distribution system. Participants with questions or concerns regarding service delivery or safety, such as a natural gas outage or gas odor should continue to contact Vectren. Meter readings and other billing questions should also continue to be directed to Vectren.

Questions or concerns regarding the aggregation program should be directed to the CRNGS or the City of Xenia.

Question or Concern	Contact	Telephone Number
Gas Odor or leaks	Vectren Delivery	1-800-227-1376
Turn on or off gas service	Vectren Delivery	1-800-227-1376
Billing Disputes	Vectren Delivery	1-800-227-1376
Enroll or opt-out of program	CRNGS	1-800-XXX-XXXX
Program Questions or Concerns	CRNGS	1-800-XXX-XXXX
Unresolved Disputes	Public Utilities	1-800-686-7826 (voice)
	Commission of Ohio	1-800-686-1750 (TDD)
Unresolved Disputes	Ohio Consumers Council	1-877-742-5622 or occ@occ.state.oh.us

Liability

The City shall not be liable to Members in the Aggregation Group for any claims whatsoever arising out of the aggregation program or the provision of aggregation services by the City or the Provider. Aggregation Group members shall assert any such claims solely against the Provider pursuant to the Power Supply Agreement, under which such participants are express third-party beneficiaries.

Copies of Plan

Copies of this plan are available from the City of Xenia free of charge. Call The City at 937-376-7232, for a copy or for more information.

Consumer Right to Contact PUCO

Any natural gas customer, including any participant in The City of Xenia Natural Gas Aggregation Program, may contact the Public Utilities Commission of Ohio (PUCO) for information, or make a complaint against the Program, the Provider, or CGO. The PUCO may be reached toll free at 1-800-686-7826.